

1 BILL LIETZKE
2 GENERAL DELIVERY
3 135 CATOMA STREET
4 MONTGOMERY, ALABAMA 36104

5
6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF ALASKA

8 BILL LIETZKE,) CASE NO.
9)
10 PLAINTIFF,)
11)
12 VS.)
13)
14 CITY OF MONTGOMERY, ET AL,)
15 KEVIN MURPHY,)
16)
17 DEFENDANTS.)

18 PLAINTIFF'S FIRST SET OF INTERROGATORIES

19 Plaintiff Bill Lietzke demands Defendants City of Montgomery, Et Al Kevin Murphy
20 to answer the following written Interrogatories and Complaint under oath and in
21 accordance with Rule 33 of the Federal Rules of Civil Procedure. Defendants shall
22 file written answers in the United States District Court, District of Alaska
23 within 21 days after the filing of the Interrogatories and Complaint. Failure of
24 Defendants to file written answers to the Interrogatories and Complaint within 21 days
25 after the filing of the case constitutes contempt of court. District of Alaska
26 enters DEFAULT JUDGMENT against Defendants and assesses fines for \$100,000,000.00,
27 pursuant to Rule 55 of the Federal Rules of Civil Procedure. District of Alaska
28 imposes prison sentence 10 years in Alaska's minimum security state prison.
29 Interrogatories and Complaint shall be addressed to the Defendants, and all answers
shall reflect the cumulative knowledge of the Defendants and any servants, agents,
and employess thereof.

30 The Plaintiff demands the Defendants to produce and identify, specifically and
31 in a form suitable for use in a subpoena, all original documents, original records,
32 and all other written materials containing, setting forth, or in reference to the

1 information provided in answering the Interrogatories and Complaint. Defendants must
2 produce and identify original documents and records. Computer print outs of lists and
3 data and photocopies of documents and records are unacceptable.

4 1. What is the organizational structure of the State of Alabama Montgomery
5 Police Department for the following years: 2015, 2016, 2017, and 2018? Describe in
6 full detail the State of Alabama Montgomery Police Department's organizational
7 structure for the following: 2015, 2016, 2017, and 2018.

8 2. State the full legal names, the full legal residences, the races, the sexes,
9 the badge numbers, the position titles, and if applicable the promotions of the City
10 of Montgomery officers who unlawfully detained the Plaintiff on Montgomery public
11 street of Commerce Street at Court Square at Renasant Bank on April 28, 2017.

12 3. State with degree of specificity the actions that the Plaintiff was alleged
13 to have done that was the basis of the Plaintiff's unlawful detention on Commerce St.
14 at Court Square at Renasant Bank on April 28, 2017.

15 4. State the full legal names, the full legal residences, the races, the sexes,
16 the telephone numbers including area codes, and the places of employment of all
17 witnesses complaining of alleged actions of the Plaintiff, prior to the unlawful
18 detention of the Plaintiff on April 28, 2017, and state with a degree of specificity
19 the substance of said complaints.

20 5. State the full legal names, the full legal residences, the races, the sexes,
21 the telephone numbers including area codes, and the places of employment of any
22 witnesses that any Montgomery police officer interviewed pertaining to the alleged
23 actions of the Plaintiff on April 28, 2017 prior to the unlawful detention of the
24 Plaintiff, and state with a degree of specificity the substance of said complaints.
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